



Via Electronic ECFS Filing

March 1, 2008

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

RE: Certification of CPNI Filing, EB-06-TC-060

Dear Ms. Dortch:

Pursuant to section 64.2009(e) of the Commission's rules<sup>4</sup> and the Commission's *Public Notice*, DA 08-171, dated January 29, 2008 in the above-captioned matter, Granite Telecommunications, LLC hereby submits its compliance certificate and a statement explaining how the Company's operating procedures ensure compliance with these regulations.

By the attached Certificate, I hereby certify to the Commission that Granite Telecommunications, LLC has established, and strictly follows, policies and operating procedures to fully comply with section 64.2009 of the Commission's rules governing Customer Proprietary Network Information ("CPNI").

Granite Telecommunications, LLC has established strict policies, which expressly prohibit release of CPNI to any employee not directly involved in the provision of service to the customer, subject to disciplinary action and termination of employment. Each employee receives an initial CPNI protection briefing and annual CPNI protection requirement reviews thereafter. All employees are strictly held to non-disclosure obligations.

CPNI data is accessible only to those employees with a "need to know" for purposes of serving current subscribers. The Company does not sell, or otherwise release, CPNI to other entities under any circumstances. Granite Telecommunications, LLC has no affiliates. All contact with customers is documented through retention of electronic copies of communications and retention of any scripts used if contacting subscribers telephonically, for a minimum period of one year. All sales or marketing campaigns initiated by the Company require approval by the Vice President of Marketing who is responsible for ensuring that each campaign strictly complies with the Commission's CPNI regulations.

Questions regarding this matter may be directed to me.

Sincerely,

GRANITE TELECOMMUNICATIONS, LLC

A handwritten signature in blue ink, appearing to read "Rand Currier", is written over the company name.

Rand Currier  
Vice President and Chief Operating Officer

<sup>4</sup> 47 C.F.R. §64.2009(e).

**Annual 47 C.F.R. S: 64.2009(e) CPNI Certification  
EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2008.

Date filed: March 1, 2008

Name of company covered by this certification: Granite Telecommunications, LLC

Form 499 Filer ID: 822170

Name of signatory: Rand Currier

Title of signatory: Vice President and Chief Operating Officer


I, Rand Currier, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. S: 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken, nor been compelled to take, any actions<sup>5</sup> against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

GRANITE TELECOMMUNICATIONS,  
LLC

Signed  \_\_\_\_\_

Rand Currier  
Vice President and Chief Operations Officer  
100 Newport Avenue Ext.  
Quincy, MA 02171  
Telephone: 617.933.5500

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<sup>5</sup> Proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers.